

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	) Case No. 17-10514-TPA
	)
B.L. Gustafson, LLC d/b/a Gus's Guns, d/b/a	) Chapter 11
Priority Care Ambulance, d/b/a Brian Gustafson	)
Rentals, d/b/a B.L. Gustafson Excavation, d/b/a	)
Brynwood Farm,	) Related to Doc. No. 150
Debtors	)
	)
Kubota Credit Corporation,	)
Movant	)
	)
vs.	)
	)
B.L. Gustafson, LLC d/b/a Gus's Guns, d/b/a	)
Priority Care Ambulance, d/b/a Brian Gustafson	)
Rentals, d/b/a B.L. Gustafson Excavation, d/b/a	)
Brynwood Farm,	) Date and Time of Hearing:
Respondent	) April 26, 2018 at 10:00 a.m.

**DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM AUTOMATIC STAY**

AND NOW, this 16<sup>th</sup> day of April, 2018, comes the Debtor, by and through its counsel, Knox McLaughlin Gornall & Sennett, P.C., with this Answer to the Movant's Motion for Relief from Automatic Stay, as follows:

**FIRST DEFENSE**

Paragraphs 1, 2 and 3 are admitted, further averring the Agreement speaks for itself. The Debtor is without sufficient knowledge or information to form a belief as to the truth of the allegations in paragraphs 6, 7, 8 and 9, which are therefore denied. Paragraphs 10 and 11 are also denied. The allegations in Paragraphs 4 and 5 represent legal conclusions to which no responses are required. To the extent that responses are required, paragraphs 4 and 5 are denied.

**SECOND DEFENSE**

12. The value of the Equipment is greater than the debt.

13. The Equipment is insured.
14. The Equipment is maintained.
15. There is equity in the Equipment for the benefit of the Debtor and the estate.

**THIRD DEFENSE**

16. The equipment is necessary for an effective reorganization.

WHEREFORE, the Debtor requests that the Motion be denied; and, that the Debtor have such other and further relief as is reasonable and just.

Respectfully submitted,

KNOX McLAUGHLIN GORNALL &  
SENNETT, P.C.  
Attorneys for Debtor

By: /s/ Guy C. Fustine  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 16<sup>th</sup> day of April, 2018, a copy of the Debtor's Answer to the Movant's Motion for Relief from Automatic Stay was served by first class, United States mail, postage pre-paid, and/or electronic service as set forth on the attached service list.

Respectfully submitted,

KNOX McLAUGHLIN GORNALL &  
SENNETT, P.C.  
Attorneys for Debtors

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**SERVICE LIST**

**Via US Mail:**

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